

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE:	)	In Proceedings
	)	Under Chapter 13
JAMES JOHNSON, JR.,	)	
	)	Case No. 14-43271
Debtor.	)	Honorable Judge Black

**OBJECTION TO CONFIRMATION OF PLAN**

NOW COMES Rushmore Loan Management Services LLC as servicing agent for Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Stanwich Mortgage Loan Trust, Series 2013-7, by and through its undersigned attorney with Kropik, Papuga and Shaw, on its Objection to Confirmation of Plan and in support thereof states as follows:

1. On July 5, 2001, the Debtor did execute and deliver a certain note and mortgage in the amount of \$64,800.00 (Exhibit A), secured by a mortgage on the property commonly known as 524 Chase Avenue, Joliet, Illinois 60432 (Exhibit B).
2. The Debtor filed a petition under Chapter 13 of Title 11, United States Bankruptcy Code on December 3, 2014, and this Court has jurisdiction pursuant to 28 U.S.C. §1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois.
3. Pursuant to 11 U.S.C. § 1322 (b)(2), the Debtor is not allowed to modify the rights of a holder of a secured claim when the claim is secured only by a security interest in real property that is the Debtor's principal residence.
4. The Debtor's Chapter 13 bankruptcy petition lists the street address where he resides as 524 Chase Avenue, Joliet, Illinois 60432.

5. That the Debtor's Chapter 13 plan proposes to cram down the first mortgage lien on Debtor's single family residence under Section E (3.1)(a). The plan provides for a secured claim of \$60,593.00 at 4.00% interest with set monthly payments of \$1,115.91.
6. That Rushmore Loan Management Services LLC intends to file a claim secured by an interest in the real property commonly known as 524 Chase Avenue, Joliet, Illinois 60432.
7. As of January 20, 2015, there remained due and owing on the note and mortgage referenced in paragraph one hereof, the sum of \$116,341.36. This figure includes an arrearage claim of approximately \$60,966.66.

WHEREFORE, Rushmore Loan Management Services LLC as servicing agent for Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Stanwich Mortgage Loan Trust, Series 2013-7, respectfully requests this Court of entry of an Order denying confirmation of plan and for such other and further relief as the Court deems just.

Respectfully Submitted,

/s/ Jennifer M. Rinn

Jennifer M. Rinn

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